

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

SHANTA LYNETTE BROWN, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action: 6:23cv00054
)	
THE CITY OF LYNCHBURG, <i>et al.</i> ,)	
)	
Defendants.)	

MOTION

Defendants City of Lynchburg, Officer Seth Reed, Deputy Zachary Miller, and Officer Robbin Miller, by counsel, move for an order granting the parties to this lawsuit access to the expunged records pertaining to the criminal charges against Plaintiffs Shanta Lynette Brown and Aquasha Sandidge. In support of their motion, Defendants state as follows:

1. After Plaintiff Shanta Lynette Brown was acquitted of her criminal charges, the Circuit Court of the City of Lynchburg entered an order expunging records of the investigation and court records pertaining to one of the charges against her.
2. After the criminal charges against Plaintiff Aquasha Sandidge were dismissed, the Circuit Court of the City of Lynchburg entered an order expunging records of the investigation and court records pertaining to all charges against her.
3. Inasmuch as the Clerks of Court, Lynchburg Police Department, and Commonwealth's Attorney's office have records pertaining to the charge, they are not allowed to produce or share the records without violation of the terms of the expungement order.
4. It is necessary for the Defendants to obtain access to the records to defend themselves in this civil action.

5. Counsel for the Defendants have discussed this motion with counsel for Plaintiffs, and there is no objection to entry of an order.

WHEREFORE, Defendants respectfully move the Court for entry of an order granting access to expunged records of the criminal charge against Plaintiff Shanta Lynette Brown and the criminal charges against Plaintiff Aquasha Sandidge and for such other relief as the Court may deem appropriate.

CITY OF LYNCHBURG, SETH REED,
ZACHARY MILLER, and ROBBIN MILLER

By /s/ John R. Fitzgerald
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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of March, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to:

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